

THE HONORABLE JAMES L. ROBART

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

SRC LABS, LLC & SAINT REGIS  
MOHAWK TRIBE,

Plaintiffs,

v.

MICROSOFT CORPORATION,

Defendant.

CASE NO. 2:18-cv-00321-JLR

**DECLARATION OF CHRISTOPHER L.  
EVANS IN SUPPORT OF PLAINTIFF'S  
OPENING CLAIM CONSTRUCTION  
BRIEF**

I, Christopher L. Evans, hereby declare as follows:

1. My name is Christopher L. Evans. I am over eighteen years of age and competent to testify about matters in this affidavit. I have personal knowledge of all matters set forth herein.

2. I am a partner at the law firm Shore Chan DePumpo LLP, counsel for Plaintiffs SRC Labs, LLC ("SRC") and Saint Regis Mohawk Tribe (the "Tribe").

3. Attached as **Exhibit 1** is a true and correct copy of pages from the Microsoft Press Computer Dictionary (3rd ed., 1997).

4. Attached as **Exhibit 2** is a true and correct copy of the IEEE Standard Glossary of

1 Computer Hardware Terminology approved June 14, 1994 regarding the term “bank”.

2 5. Attached as **Exhibit 3** is a true and correct copy of Kung, et al., “Systolic arrays  
3 for VLSI,” SIAM, Sparse Matrix Proceedings, 1978 1-29.

4 6. Attached as **Exhibit 4** is a true and correct copy of a Kung, H.T., “Why Systolic  
5 Architectures?”, IEEE Computer, Jan. 1982, 37-46.”

6 7. Attached as **Exhibit 5** is a true and correct copy of the September 4, 2018  
7 Declaration of Dr. Harold Stone Regarding U.S. Patent No. 7,225,324 filed in IPR2018-01601  
8 as Ex. 1003.

9 8. Attached as **Exhibit 6** is a true and correct copy of the August 24, 2018  
10 Declaration of Dr. Harold Stone Regarding U.S. Patent No. 76,434,687 filed in IPR2018-01594  
11 as Ex. 1003.

12 9. Attached as **Exhibit 7** is a true and correct copy of Paper No. 1 in IPR2018-  
13 01601, Petition for Inter Partes Review of U.S. Patent No. 7,225,324 Under 35U.S.C. §§ 311-319  
14 and 37 C.F.R. §42.1-.80 & 42.100-.123.

15 10. Attached as **Exhibit 8** is a true and correct copy of Hartenstein, et al., “A  
16 reconfigurable data-driven ALU for Xputers,” Proceedings of the 1994 IEEE Workshop on  
17 FPGAs for CCMs, April 10-13, 1994, 139-146.

18 11. Attached as **Exhibit 9** is a true and correct copy of John Schewel et al, “High-  
19 Speed Computing, Digital Signal Processing, and Filtering Using Reconfigurable Logic,”  
20 Proceedings SPIE Vol. 2914 (Nov. 1996).

21 12. Attached as **Exhibit 10** is a true and correct copy of the October 19, 2018  
22 Declaration of Brad L. Hutchings in IPR2019-00103 as Ex. 1002.

13. Attached as **Exhibit 11** is a true and correct copy of Paper No. 1 in IPR2019-00103, Petition for Inter Partes Review of U.S. Patent No. 7,149,867 Under 35U.S.C. §§ 311-319 and 37 C.F.R. §42.1-.80 & 42.100-.123.

14. Attached as **Exhibit 12** is a true and correct copy of Vanderwiel, Steven P. and David. J. Lilja. "Data prefetch mechanisms." ACM Comput. Surv. 32 (2000): 174-199.

15. Attached as **Exhibit 13** is a true and correct copy of Tien-Fu Chen and J. -. Baer, "A performance study of software and hardware data prefetching schemes," Proceedings of 21 International Symposium on Computer Architecture, Chicago, IL, USA, 1994, pp. 223-232.

16. Attached as **Exhibit 14** is a true and correct copy of the October 5, 2018 Rebuttal Declaration of Tarek El-Ghazawi taken in in 2:18-cv-00317-JLR; SRC Labs LLC and Saint Regis Mohawk Tribe v. Amazon Web Services, Inc., Amazon.com, Inc., and Vadata, Inc.

17. Attached as **Exhibit 15** is a true and correct copy of the October 5, 2018 Rebuttal Declaration of Dr. Houman Homayoun taken in 2:18-cv-00317-JLR; SRC Labs LLC and Saint Regis Mohawk Tribe v. Amazon Web Services, Inc., Amazon.com, Inc., and Vadata, Inc.

18. Attached as **Exhibit 16** is a true and correct copy of the October 18, 2018 Deposition of Tarek El Ghazwi, Ph.D. taken in 2:18-cv-00317-JLR; SRC Labs LLC and Saint Regis Mohawk Tribe v. Amazon Web Services, Inc., Amazon.com, Inc., and Vadata, Inc.

19. Attached as **Exhibit 17** is a true and correct copy of the October 19, 2018 Deposition of Houman Homaoung, Ph.D. taken in 2:18-cv-00317-JLR; SRC Labs LLC and Saint Regis Mohawk Tribe v. Amazon Web Services, Inc., Amazon.com, Inc., and Vadata, Inc.

20. Attached as **Exhibit 18** is a true and correct copy of the September 21, 2018 Declaration of Tarek El-Ghazawi served in 2:18-cv-00321-JLR; SRC Labs LLC and Saint Regis

1 Mohawk Tribe v. Microsoft Corporation.

2 21. Attached as **Exhibit 19** is a true and correct copy of the October 5, 2018 Rebuttal  
3 Declaration of Tarek El-Ghazawi served in 2:18-cv-00321-JLR; SRC Labs LLC and Saint Regis  
4 Mohawk Tribe v. Microsoft Corporation.

5 22. Attached as **Exhibit 20** is a true and correct copy of the October 5, 2018 Rebuttal  
6 Declaration of Dr. Houman Homayoun served in 2:18-cv-00321-JLR; SRC Labs LLC and Saint  
7 Regis Mohawk Tribe v. Microsoft Corporation.

8 23. Attached as **Exhibit 21** is a true and correct copy of the October 18, 2018  
9 Deposition of Tarek El-Ghazawi, Ph.D. taken in 2:18-cv-00321-JLR; SRC Labs LLC and Saint  
10 Regis Mohawk Tribe v. Microsoft Corporation.

11 24. Attached as **Exhibit 22** is a true and correct copy of the October 19, 2018  
12 Deposition of Tarek El-Ghazawi, Ph.D. taken in 2:18-cv-00321-JLR; SRC Labs LLC and Saint  
13 Regis Mohawk Tribe v. Microsoft Corporation.

14 25. Attached as **Exhibit 23** is a true and correct copy of the October 17, 2018  
15 Deposition of Henry Houh, Ph.D. taken in 2:18-cv-00321-JLR; SRC Labs LLC and Saint Regis  
16 Mohawk Tribe v. Microsoft Corporation.

17 26. Attached as **Exhibit 24** is a true and correct copy of excerpts from the October 12,  
18 2018 Deposition of Derek Chiou taken in 2:18-cv-00321-JLR; SRC Labs LLC and Saint Regis  
19 Mohawk Tribe v. Microsoft Corporation.

20 27. Attached as **Exhibit 25** is a true and correct copy of the September 21, 2018  
21 Opening Report of Brad Hutchings, Ph.D. Regarding Markman Issues served in 2:18-cv-00317-  
22 JLR; SRC Labs LLC and Saint Regis Mohawk Tribe v. Amazon Web Services, Inc.,

1 Amazon.com, Inc., and Vadata, Inc.

2 28. Attached as **Exhibit 26** is a true and correct copy of the September 21, 2018  
3 Declaration of Dr. Henry Houh in Support of Defendant's Claim Construction Positions served  
4 in 2:18-cv-00321-JLR; SRC Labs LLC and Saint Regis Mohawk Tribe v. Microsoft Corporation.  
5 Plaintiffs' expressly reserve their right to exclude Dr. Houh's opinions under Federal Rule of  
6 Evidence 702.  
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8 I declare under the penalty of perjury under the laws of the United States that for foregoing  
9 is true and correct.

10 Signed this 5th day of November, 2018 at Dallas, Texas.

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Christopher L. Evans

**CERTIFICATE OF SERVICE**

I hereby certify that on this 5th day of November, 2018, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all counsel of record.

s/Karin B. Swope  
Karin B. Swope, WSBA #24015